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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

KENNETH R. BROWN, individually and)
on behalf of a Class of similarly situated)
Washington residents,)

Plaintiff,)

v.)

CONSUMER LAW ASSOCIATES LLC,)
a Maryland Limited Liability Company;)
JIMMY B. PERSELS, a Maryland)
Attorney; NEIL J. RUTHER, a Maryland)
Attorney; DR OPTIONS LLC d/b/a)
DEBT RELIEF OPTIONS LLC, a Texas)
Limited Liability Company; EFA)
PROCESSING L.P., a Texas Limited)
Partnership; and JOHN AND JANE)
DOES 1-20,)

Defendants.)

NO. CV-11-0194-LRS

CLASS ACTION

PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION

WITH ORAL ARGUMENT

May 17, 2012 at 2:30 p.m.
Yakima, Washington

PLAINTIFF'S MOTION FOR CLASS
CERTIFICATION: 1

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1 Plaintiff, by and through his counsel, moves the Court, pursuant to FED. R.
2 Civ. P. 23, for an order certifying this matter as a class action, designating a Class
3 composed of all Washington residents who entered into a debt settlement
4 agreement, or like instrument with Consumer Law Associates LLC, DR Options
5 LLC, d/b/a Debt Relief Options LLC, or EFA Processing, L.P., appointing named
6 Plaintiff as representative of that Class, designating undersigned counsel as Class
7
8 counsel, and providing for submission and approval of appropriate and timely
9
10 notice to Class members.
11

12 This Motion is based on the Declaration of Matthew J. Zuchetto, Declaration
13 of Toby J. Marshall, Declaration of Kenneth R. Brown, Declaration of Joseph M.
14 Gusmano, Plaintiff's Memorandum of Authorities in Support of Motion for Class
15 Certification filed herewith, and the pleadings and other documents of record in
16
17 this matter.
18

19 DATED this 16th day of March, 2012.

20 THE SCOTT LAW GROUP, P.S.

21
22 By: 

23 Darrell W. Scott, WSBA #20241

24 darrellscott@mac.com

25 Matthew J. Zuchetto, WSBA #33404

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PLAINTIFF'S MOTION FOR CLASS
CERTIFICATION: 2

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CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the following:

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**PLAINTIFF'S MOTION FOR CLASS
CERTIFICATION: 4**

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1 EXECUTED this 16th day of March, 2012, at Spokane, Washington.

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3 MARY FERRERA
4 of The Scott Law Group, P.S.
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PLAINTIFF'S MOTION FOR CLASS
CERTIFICATION: 5

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